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**VIA ECF**

Honorable Arlene R. Lindsay, U.S.M.J.  
Long Island Federal Courthouse  
814 Federal Plaza  
Central Islip, New York 11722-4451

**Re: Ora Naftali and Roni Naftali v. New York Deferred Exchange Corp., et al.  
Civil Action No. 15-cv-7152 (JMA)(ARL)**

Dear Judge Lindsay:

This firm represents Second Third Party Defendant Joseph Taplitzky in the above-caption matter pending before Your Honor. An Answer to the Second Third Party Complaint was just recently filed on behalf of Mr. Taplitzky on December 21, 2018 (ECF No. 54).

As a newly added party to this litigation, Mr. Taplitzky will need to familiarize himself with the underlying claims between the various parties to this action, review previously exchanged written discovery responses, issue and respond to written discovery requests, and prepare for and participate in any upcoming depositions. As per the Court's Order of July 18, 2018, the deadlines set forth in the Proposed Scheduling Order filed with the Court on July 13, 2018 (ECF No. 44) were affirmed ("Scheduling Order"). Pursuant to the Scheduling Order, the close of fact discovery is currently scheduled to close on January 18, 2019. Given the very limited amount of time before that deadline, it would be difficult, if not impossible, for Mr. Taplitzky to meaningfully participate in the discovery process.

With the consent of counsel for all parties to this litigation, please allow this letter to serve as a request that the Court grant an extension of all discovery deadlines in this matter for 120 days in order to allow the parties to all actively participate in the completion of discovery in this matter. A proposed scheduling order is attached for the Court's review and consideration. Alternatively, please allow this letter to serve as a request that Your Honor schedule an in-person or telephonic status conference whereby the parties and Your Honor can establish new discovery deadlines in this action.

We thank Your Honor for your consideration of this request.

Respectfully submitted,

/s/

Marc C. Singer

c: All counsel (via electronic mail)